

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
CRIMINAL NO. 08-11 (JRT/JSM)

UNITED STATES OF AMERICA, )  
Plaintiff, ) SUPERSEDING INDICTMENT  
v. ) (18 U.S.C. § 1543)  
MEHRAN MAKARI SAHELI, ) (18 U.S.C. § 1546(a))  
Defendant. )

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Use of False, Forged, Counterfeited, and Altered Passport)

On or about January 12, 1998, in Hennepin County, in the State and District of Minnesota, the defendant,

**MEHRAN MAKARI SAHELI,**

did willfully and knowingly use a false, forged, counterfeited, and altered passport, and an instrument purporting to be a passport, that is: a Turkish passport, bearing the name Mehran Makari Saheli and passport number TR-I 610327, all in violation of Title 18, United States Code, Section 1543.

COUNT 2

(False Statements in Immigration Document)

On or about December 2, 2005, in Hennepin County, in the State and District of Minnesota, the defendant,

**MEHRAN MAKARI SAHELI,**

did knowingly make under penalty of perjury, pursuant to Section 1746 of Title 28, United States Code, a false statement with respect to a material fact in an application and other document

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FILED AUG 12 2008  
RICHARD D. SLETHEN  
JUDGMENT ENTD  
DEPUTY CLERK *[Signature]*

U.S. v. Mehran Makari SaheliCriminal No. 08-11 (JRT/JSM)

required by the immigration laws and regulations of the United States, and knowingly present such application and other document required by the immigration laws and regulations of the United States which contained a materially false statement, in that defendant, in applying to Register Permanent Residence or Adjust Status, answered "no," in response to the question, "Have you ever, in or outside the United States: a. knowingly committed any crime of moral turpitude. . . .for which you have not been arrested?" When in fact (1) defendant possessed a passport that was not his own; (2) defendant previously used a passport that was not his own to procure a U.S. visa; and (3) defendant used a false Turkish passport, bearing number TR-I 610327, to enter the United States on January 12, 1998; all in violation of Title 18, United States Code, Section 1546(a).

COUNT 3

(Use of False, Forged, Counterfeited, and Altered Passport)

On or about September 28, 2006, in Hennepin County, in the State and District of Minnesota, the defendant,

**MEHRAN MAKARI SAHELI,**

did willfully and knowingly use a false, forged, counterfeited, and altered passport, and an instrument purporting to be a passport, that is: a Turkish passport, bearing the name Mehran Makari Saheli

U.S. v. Mehran Makari Saheli

Criminal No. 08-11 (JRT/JSM)

and passport number TR-I 610327, all in violation of Title 18, United States Code, Section 1543.

COUNT 4

(Possession of a Fraudulent Immigration Document)

From at least in or about December 2005, through on or about June 24, 2008, in Hennepin County, in the State and District of Minnesota, the defendant,

**MEHRAN MAKARI SAHELI,**

did knowingly possess a Turkish passport bearing the name Mehran Makari Saheli, a document prescribed by statute or regulation for entry into and as evidence of authorized stay and employment in the United States, knowing such document had previously been forged, counterfeited, altered and falsely made, in that the passport was never issued by Turkey to the defendant, but bore defendant's name and was used by the defendant, in violation of Title 18, United States Code, Section 1546(a).

A TRUE BILL

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UNITED STATES ATTORNEY

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FOREPERSON